

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

**LETTER FOR BAIL
MODIFICATION
IND# 20-CR-003 (KPF)**

OLADAYO OLADOKUN,

Defendant.

MEMO ENDORSED

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Your Honor,

Defendant Oladayo Oladokun submits this letter requesting a modification in Mr. Oladokun's bail conditions. Mr. Oladokun's bail conditions contain, among other things, that he be subject to home confinement. We request that his bail conditions be modified to allow him to go to a nearby gym for one hour each day to engage in regular exercise. We request that he be allowed 90 minutes outside the home, we propose from 11:00 AM to 12:30 PM, so that he can get to and from the gym and still have a full hour for exercise.

Mr. Oladokun's health care provider, Unity Healthcare, stated in a note from a recent visit that Mr. Oladokun has an A1C of 5.9, which is in the pre-diabetic range. This, combined with his asthma and other health issues detailed in the written bail application made earlier this year, are best managed with a mixture of diet and regular exercise. In their note Unity Healthcare stated "[t]here is no need for medication at this time, but recommended healthy diet and regular exercise daily so that you avoid developing diabetes."

We contacted Intensive Supervision Specialist Josh Rothman who stated that Pretrial Services would consent to the modification request for the defendant to work out at a local gym for 60 to 90 minutes each day at a set time to be discussed in advance with his officer in Maryland. Specialist Rothman stated that Mr. Oladokun should also provide documentation as requested (i.e., check-in information at the gym). In light of Pretrial Services position Assistant United States Attorney Alexander Li, counsel for the Government, stated via email that the Government has no objection to the modification.

Based upon the foregoing, it is respectfully requested that Mr. Oladayo Oladokun's bail conditions be modified to allow him to leave his home for 90 minutes each day, at a time to be set with his Pretrial Services Officer in Maryland, so that Mr. Oladokun may engage in regular daily exercise as his healthcare provider recommends.

Dated: 10/8/2021

Respectfully Submitted,

Dawn M. Florio

Dawn M. Florio Law Firm P.L.L.C.
By DAWN M. FLORIO
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To: Clerk of the District Court
Southern District of New York
AUSA Alexander Li
AUSA Thomas Burnett

Application GRANTED.

Mr. Oladokun's bail conditions are hereby MODIFIED to permit him to travel to and from and use a gym for one 90-minute period each day. Mr. Oladokun shall select the timing of his visits to the gym in consultation with his assigned Pretrial Services Officer, and shall provide upon request any documentation related to his visits to his assigned Officer.

Dated: October 12, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE